

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MUNICIPAL DERIVATIVES
ANTITRUST LITIGATION

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) MDL No. 1950
)
) Master Docket No. 08-02516 (VM) (GWG)

This Document Relates to:
ALL ACTIONS

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**CLASS PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENTS WITH DEFENDANTS BANK OF AMERICA, N.A.,
AND TRINITY FUNDING CO., LLC, TRINITY PLUS FUNDING CO., LLC, AND GE
FUNDING CAPITAL MARKET SERVICES, INC.**

Class Plaintiffs hereby respectfully move for the following:

1. An Order for each of the settling defendants granting final approval of the settlement agreement reached between Plaintiffs the City of Baltimore, MD, the Central Bucks School District, and the Bucks County Water & Sewer Authority ("Plaintiffs"), individually and on behalf of the putative class of purchasers in this action (the "Settlement Class" or "Class"), and A) Defendant Bank of America, N.A. ("BoA") and B) Trinity Funding Co., LLC, Trinity Plus Funding Co., LLC, and GE Funding Capital Market Services, Inc. ("GE Defendants").

2. That pursuant to the BoA Agreement, BoA will make a total cash payment of \$19,437,500 (plus any funds remaining in the State AG Escrow Fund that, as of the date that Notice was issued, BoA had access to pursuant to the terms of the State AG Settlement (and excluding any funds in the State AG Escrow Fund as of the date that Notice was issued that BoA has contractually agreed, in writing, to pay as of that date) for the benefit of the Class.

3. BoA will make an initial payment of \$10 million within 10 days of receiving wiring instructions and a W9 from Class Plaintiffs, and make its final remaining payment

within ten (10) business days after the Court's final approval of the BoA Settlement Agreement, in exchange for dismissal and releases by the Court of the claims of the Class against Bank of America, N.A.

4. That, pursuant to the GE Defendants' Settlement Agreement, GE Defendants have made a total cash payment of \$18,250,000 for the benefit of the Class (\$200,000 of which will be refunded) and in exchange for the dismissal and releases by the Court of the claims of the Class against GE Defendants.

5. That the Settlement Classes be approved as set forth in the proposed orders attached hereto.

Therefore, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Class Plaintiffs respectfully request that the Court enter an Order for each settlement, in the form attached herewith as the Proposed Orders and Final Judgments, approving the Settlement Agreements and granting such other and further relief as may be appropriate.

This motion is supported by the Settlement Agreements; Class Plaintiffs' Memorandum of Law in Support of Motion for Final Approval, submitted herewith; the Affidavit of Charlene Young, and all exhibits attached thereto; all pleadings filed in this case; and such additional evidence or argument as may be presented to the Court.

The Settling Defendants do not oppose the motion and seek the same relief as set forth herein.

Dated: May 27, 2014

Respectfully submitted,

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